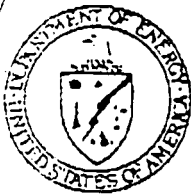


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The Administrative Record Staff



## Department of Energy

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JUL 02 1992

92-DOE-7047

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U. S. Environmental Protection Agency, Region VIII  
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Denver, Colorado 80202-2405

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, Colorado 80220

ADMIN RECORD

Gentlemen:

This correspondence is provided in response to your letter, dated June 19, 1992, regarding delays in the start of fieldwork for approved RFI/RI workplans. At this point in time, it has become clear that the DOE and its contractors will be unable to meet most schedule commitments listed in Table 6 of the Interagency Agreement (IAG) after mid-1992. This conclusion is based on preliminary results of an analysis of the total environmental restoration program at Rocky Flats. Despite problems with specific schedules, the DOE remains absolutely committed to the successful remediation of Rocky Flats, consistent with the full scope of the IAG. Major factors contributing to the projected schedule problems are summarized below.

- 1) The IAG Table 6 Milestone Schedules are based on detailed schedules which were negotiated in 1990 with the EPA and CDH. These detailed schedules are based on planning assumptions which were developed from 1990 conditions and best professional judgment. Several key assumptions have been proven by actual experience to be overly optimistic and unachievable. These include:
  - a) Laboratory processing times. Actual average for radiological samples is 100-200 days versus 63 days assumed in the IAG.
  - b) Procurement of support contractors. Actual average of 80-120 days versus 30 days assumed in the IAG.
- 2) The IAG Scope of Work defined some specific tasks, but left many quantities and activities open to interpretation. In almost all cases, the DOE is performing more work than originally estimated when 1992 budgets were prepared. The DOE has obtained more than double the original budget requested in December 1989, however, even this amount has not been able to keep pace with the growth in scope of the IAG tasks.

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- 3) The mission and future scenario for Rocky Flats have changed radically since the IAG was signed in January 1991. It now appears clear that a production mission is being phased out, and soon the full focus of the site will be toward environmental restoration and decommissioning or reuse activities. This is impacting the routine conduct of business at Rocky Flats and may strongly indicate a need to relook the sequence and grouping of operable units within the IAG.

It is DOE's intent to provide for a detailed discussion of each of these areas by the end of August 1992, in preparation for our joint analysis of the Site-Specific Plan for FY93. We are willing to begin this dialogue at our July 7, 1992 IAG Coordinators' Meeting, as you requested. However, all the information has not yet been assembled and we anticipate a need for additional sessions. The DOE view this dialogue as a means to increase your understanding of the environmental restoration program defined by the IAG and work toward developing an aggressive, but achievable program. The current IAG schedule is unachievable under any funding scenario. We believe these discussions should result in an amendment of the IAG that would include a restructuring of the Table 6 milestones based on the best information from actual field experience and the current transition mission planning. We believe the scope of the required changes makes an amendment in accordance with Part 41 preferable to the milestone by milestone approach described in Part 42 in the IAG. We also believe the scope of changes to be considered may warrant full review and comment by the public.

The IAG was signed by the DOE as a commitment to the environmental restoration of the Rocky Flats Plant. We have not wavered from that commitment, but find it necessary to revise our schedules based on the realities of the marketplace and a changing world. We desire your participation in this process and anticipate a successful revision to put the environmental restoration program back on an achievable track to success.

Sincerely,

  
James K. Hartman  
Assistant Manager  
for Environmental Management